Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests review of Section 11 rules for Emergency Alert System. The stated Purpose of EAS in Section 11.1 opens with *"The EAS provides the President with the capability to provide immediate communications and information to the general public at the National, State and Local Area levels during periods of national emergency."* From this it is clear that the primary purpose of EAS is on the National level. As an aside, the final statement in the Purpose is "*The EAS may be used to provide the heads of State and local government, or their designated representatives, with a means of emergency communication with the public in their State or Local Area.*" Thus, State and Local agencies can <u>also</u> use the system, but the Primary purpose remains a National communication system.

With such a directive, it is clear that all needed equipment at licensee locations should be provided by, maintained by, and updated by the Federal government. There is no motivation for any manufacturer to provide equipment that can only be bought one time; as evidenced by the few options licensees have to buy required EAS gear. The enormous financial burden to buy, install, maintain and constantly update to the FCC's latest whim of the local EAS gear should be borne by the beneficiary – that being the Federal Government and not the local licensee. EAS has become an unfunded mandate by the FCC.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services